STATE OF CONNECTICUT DEPARTMENT OF PUBLIC HEALTH HEALTHCARE SYSTEMS BRANCH

In re: Donna Kriksciun, L.P.N.

Petition No. 2005-0901-011-034

STATEMENT OF CHARGES

Pursuant to the General Statutes of Connecticut, §§19a-10 and 19a-14, the Department of Public Health (hereinafter "the Department") brings the following charges against Donna Kriksciun:

COUNT ONE

- 1. Donna Kriksciun of Oakdale (hereinafter "respondent") is, and has been at all times referenced in this Statement of Charges, the holder of Connecticut licensed practical nursing license number 025353.
- 2. From about July 2005 through about August 2005, respondent abused or utilized to excess Darvon.
- 3. Respondent's abuse of Darvon does, and/or may, affect her practice as a licensed practical nurse.
- 4. The above facts constitute grounds for disciplinary action pursuant to the General Statutes of Connecticut, §20-99(b), including but not limited to §20-99(b)(5).

COUNT TWO

- 5. Paragraph 1 is incorporated herein by reference as if set forth in full.
- 6. On January 19, 2004, the Connecticut Board of Examiners for Nursing (hereinafter "the Board") ordered a Consent Order in Petition Number 2004-0712-011-014 (hereinafter "the Order") that placed respondent's licensed practical nursing license on probation for a period of four years. Such disciplinary action was based upon respondent's admitted diversions of Vicodin and/or Oxycontin.
- 7. Said Order specifically provided that all of respondent's urine screens shall be negative for the presence of drugs and alcohol.
- 8. In or about August 2005 respondent's urine screen result was positive for Darvon.

9. Respondent's conduct as described above constitutes violations of the terms of probation as set forth in the Order, and subjects respondent's license to revocation or other disciplinary action authorized by the General Statutes of Connecticut, §§19a-17 and 20-99(b).

THEREFORE, the Department prays that:

The Connecticut Board of Examiners for Nursing, as authorized by the General Statutes of Connecticut, §§20-99(b) and 19a-17, revoke or order other disciplinary action against the license of Donna Kriksciun as it deems appropriate and consistent with law.

Dated at Hartford, Connecticut this ______ day of ______ day of ______ 2005.

Jennifer Filippone, Section Chief

Practitioner Licensing and Investigations

Healthcare Systems Branch

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